

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Jointly Administered

**MOTION INFORMING COURT OF MEETING WITH PR COURTS
ADMINISTRATOR**

TO THE HONORABLE COURT:

COME NOW the Corporación de Servicios Integrales de Salud del Area de Barranquitas, Comerío, Corozal, Naranjito y Orocovis (Corporación de Servicios Intergrales) and respectfully states as follows:

1. During a recent Omnibus hearing, the Honorable Court asked the undersigned for help with local authorities in the alternate dispute resolution of the thousands of cases which need to be valued in order for the plan of adjustment to continue forward. The undersigned diligently dealt with the layers of bureaucracy involved and was able to meet with the Hon. Sigfrido Steidel, Administrative Director of the PR Court System and Rebecca Rivera of the PR Centers for the Mediation of Conflicts, also from the PR judicial system.

2. The undersigned explained the system the FOMB had tried to put forward and the District Court's concerns. Judge Steidel made it clear that PR Judicial System was more than willing to help the PR Federal District Court valuate, settle and maybe dispose of those cases filed in the Puerto Rico legal system as long as a lift stay order was issued.

3. Judge Steidel also made fine points as to the cases which would be ripe for the type of adjudication the Board seemed interested would be much easier in cases where discovery had been completed, cases where evidentiary hearings or summary judgment motions had been filed. Judge Steidel also mentioned that cases where these things had not occurred could go forward but would take more time. Also, the issue of the service of process is important as well as the possible lack of a cause of action.

4. In addition, Attorney Rivera, director of the Mediation Office, said they were able to put their best people in cases which had not been filed in the Puerto Rico Court systems but in which the parties were willing to stipulate submission of the controversies. This would take care of extrajudicial claims involving only Puerto Rico law and documents in the Spanish Language.

5. The undersigned was going to inform the Court in person but on October 24, 2019, he was operated on for kidney stones. Unfortunately, the convalescence has been much harder than usual and he will not be able to attend without high levels of discomfort. Hence, he respectfully requests from the Honorable Court that it take notice of this motion. Any information that the FOMB would require on this, the undersigned will be available via phone.

WHEREFORE: the Corporación de Servicios Integrales de Salud respectfully requests from the Honorable Court that it take notice of this motion .

Respectfully submitted on this 29th day of October, 2019.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd
John E. Mudd
Bar Number: 201102
Attorney for Plaintiffs
LAW OFFICES JOHN E. MUDD
P. O. BOX 194134
SAN JUAN, P.R. 00919
(787) 413-1673
Fax. (787) 753-2202
johnmuddlaw@gmail.com